

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division
In Admiralty**

In the Matter of COEYMANS MARINE
TOWING, LLC D/B/A CARVER MARINE
TOWING as Owner and Operator of M/T
Mackenzie Rose, (IMO No. 8968765), *et al.*

Civil Action No. 2:24-cv-00490-MSD-LRL

**NORFOLK AND PORTSMOUTH BELT LINE RAILROAD COMPANY'S
REQUEST FOR INSPECTION OF THE M/T MACKENZIE ROSE TO
COEYMANS MARINE TOWING, LLC D/B/A CARVER MARINE TOWING**

Claimant/Respondent Norfolk and Portsmouth Belt Line Railroad Company ("Belt Line"), by counsel, pursuant to Fed. R. Civ. P. Rule 34, requests of Petitioner Coeymans Marine Towing, LLC d/b/a Carver Marine Towing, Inc., permission for the Belt Line and its attorneys, experts, surveyors, videographers, and/or photographers from, to inspect, test measure, survey, videotape, and photograph, the M/T MACKENZIE ROSE, its tackle, electronics, engines, equipment appurtenances.

Unless otherwise agreed by counsel, the inspection will be conducted at location in the vicinity of New York Harbor or Charleston Harbor, or such other location as agreed to by the parties, and on date to be agreed upon that is on or before May 16, 2025, commencing at 9:00 a.m. or such other time as agreed to by the parties.

If the requested inspection is not commenced, or not completed on that day, the conduct thereof will be adjourned from day to day, at the same time and place until completed.

Dated: April 30, 2025

NORFOLK AND PORTSMOUTH BELT
LINE RAILROAD COMPANY

By: 

James L. Chapman, IV, VSB No. 21983

W. Ryan Snow, VSB No. 47423

Mackenzie R. Pensyl, VSB No. 100012

CRENSHAW, WARE & MARTIN, P.L.C.

150 W. Main Street, Suite 1923

Norfolk, Virginia 23510

Telephone: (757) 623-3000

Facsimile: (757) 623-5735

jchapman@cwm-law.comwrsnow@cwm-law.commpensyl@cmw-law.com*Attorneys for Norfolk and Portsmouth Belt
Line Railroad Company*

CERTIFICATE OF SERVICE

I certify that on this 30th day of April 2025, I served the foregoing by electronic mail on the following:

James H. Rodgers, Esq. (*pro hac vice*)
CLYDE & CO US LLP
The Chrysler Building
405 Lexington Avenue
New York, New York 10174
(212) 702-6771
(212) 710-3950
James.Rodgers@clydeco.us

Harold L. Cohen, Esq.
CLYDE & CO US LLP
1221 Brickell Ave #1600
Miami, Florida 33131
(202) 747-5108
(202) 747-5150
Harry.Cohen@clydeco.us

Rachel Werner, Esq. (*pro hac vice*)
CLYDE & CO US LLP
One North Central Avenue, Suite 1030
Phoenix, Arizona 85004
(480) 746-4580
(480) 746-4569 Direct
(480) 746-4556 Fax
Rachel.werner@clydeco.us

Michael Roman, Esq.
Dawn Johnson, Esq.
CLYDE & CO US LLP
30 S. Wacker Drive, Ste 2600
Chicago, IL 60606
Tel No.: (312) 635-6971
Fax No.: (312) 635-6950
Michael.Roman@clydeco.us
Dawn.Johnson@clydeco.us
*Attorneys for Coeymans Marine Towing, LLC,
d/b/a Carver Marine Towing*

Mark C Nanavati, Esq. (VSB #38709)
G. Christophen Jones, Jr., Esq. (VSB #82260)
SINNOT, NUCKOLS & LOGAN, P.C.
13811 Village Mill Drive
Midlothian, Virginia 23114
(804) 893-3866 (Nanavati)
(804) 893-3862 (Jones)
(804) 378-2610 (Fax)
mnanavati@snllaw.com
cjones@snllaw.com
*Counsel for Evanston Insurance Company, s/s/o
Norfolk and Portsmouth Belt Line Railroad
Company*

Zachary M. Jett, Esq. (VSB #93285)
BUTLER WEIHMULLER KATZ CRAIG LLP
11525 N. Community House Rd, Suite 300
Charlotte, North Carolina 28277
(704) 543-2321
(704) 543-2324 (Fax)
zjett@butler.legal
*Counsel for Evanston Insurance Company
s/s/o Norfolk and Portsmouth Belt Line
Railroad Company*

